



Association for Local Telecommunications Services

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RICHARD J. METZGER
VICE PRESIDENT &
GENERAL COUNSEL

January 22, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: (1) Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137;
(2) Application by SBC Communications Inc., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Oklahoma, CC Docket No. 97-121;
(3) Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208;
(4) Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231;
(5) Request for Expedited Letter Clarification--Inclusion of Local Calls to ISPs Within Reciprocal Compensation Agreements, CC No. 96-98;
(6) Petition for Expedited Rulemaking - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98, RM-910;
(7) In the Matter of Expanded Interconnection with Local Telephone Company Facilities; CC Docket No. 91-141

Dear Ms. Salas:

On Wednesday afternoon and Thursday morning, members of ALTS met with Commission staff to discuss various matters involving checklist compliance by BellSouth (see the attached attendance lists, and the attached items distributed at these meetings).

Ms. Magalie Roman Salas
January 22, 1997
Page 2

Discussion on Wednesday afternoon included:

- Dan Gonzalez discussed NEXTLINK's experience with BellSouth's process for ordering poles.
- Nanette Edwards described DeltaCom's difficulties with BellSouth's unannounced changes to its E911 update system, and its refusal to provide E911 information as required in its interconnection agreement.
- Jim Falvey addressed ACSI's efforts to obtain number portability from BellSouth.
- Dan Gonzalez recounted NEXTLINK's service problems in its interconnection facilities with BellSouth.
- Dave Porter of WorldCom and Jim Falvey discussed the unusually high NRCs charged by BellSouth for all types of loops, the unduly high level of recurring costs for loops, and the absence of loop unbundling.
- Julia Strow and myself addressed BellSouth's failure to pay reciprocal compensation on local calls to ISPs exchanged with CLECs even though it does pay for such calls under reciprocal compensation arrangements with adjacent LECs, and treats these calls as local in its ARMIS reports, separations reports, and state rate cases.
- Dan Gonzalez raised problems encountered by NEXTLINK with its white pages listings.
- Nanette Edwards discussed dialing parity issues that had been created by BellSouth.

Topics addressed today included:

- A demonstration by Julia Strow that the vast majority of EDI orders sampled by ICI have missed the 48 hour FOC standard, followed by a discussion of LCUG performance standards by Rich Fruchterman, and ALTS performance standards by myself.
- A discussion of OSS was conducted by Nanette Edwards, Sandra Stisher and

Ms. Magalie Roman Salas

January 22, 1997

Page 3

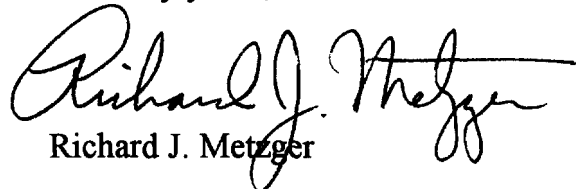
Mike Thomas of DeltaCom, and Julia Strow and Cheryl Wilcoxon of ICI. The current Harbinger EDI interface required by BellSouth was criticized, and participants pointed out that implementation of an EDI interface had failed to generate service improvements, leading to the strong inference that BellSouth continues to rely on manual intervention behind its EDI interface, even for simple resale orders.

- Collocation issues were addressed by Janine Kemp Moses of DeltaCom and myself. Ms. Moses explained that collocation was extremely expensive with BellSouth, in excess of \$300 per square foot, and that BellSouth has resisted implementation of physical collocation. Furthermore, implementation was extremely time-consuming, given the inflexible process demanded by BellSouth. I pointed out that the business schedules of most CLECs forced them to accept onerous collocation provisions rather than resort to arbitration, state decisions, and court appeals. Although the Commission originally declined to apply its various rulings concerning tariffed collocation to negotiated arrangements, it retains full authority to end these practices by promptly prescribing just and reasonable rates, terms and conditions for both physical and virtual collocation.

- Julia Strow and Rich Fruchterman gave a short account of our concern that BellSouth was utilizing the October 14th order of the Eighth Circuit to hamper the implementation of simple orders, such as extended loops, by contending such orders are "recombinations." We expressed our belief that the Commission has full power under Section 271 to prevent such gaming.

- Nanette Edwards and Dan Gonzalez concluded the meeting by providing information on E911 and trunk blocking that had been requested yesterday.

Sincerely yours,



Richard J. Metzger

cc: J. Goldstein
M. Newman
M. Kellogg
J. Lenahan
M. McDermott

1/21/98

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William J. Bailey - FCC - 202-418-7285

IRBON GORSTEN FCC/Policy " 418-2694

Jonathan Askin " 202-418-2764

David Kirschner FCC/Policy 202 418-0544

DAVID N. PORTER WORLD/Com 202-776-1550

ERIC BASH FCC/Policy 418-1188

Susan Launer FCC Policy 418-7182

Andrew Wright FCC/Policy 418-2725

Jeannie Su FCC/Policy 418-0491

MIKE RORDAN FCC 418-2043

Michael Pryor FCC/Policy 418-0495

Melissa Newman FCC/Policy 418-1508

Adam Gold ALTS 969-2587

DAN GONZALEZ NEXTLINK 466-9766

Julia Strow Intermedia 813-829-2072

Jim Falvey ACSI 301-617-4298

Nanette Edwards DeltaCom 205-650-3856

Gregory Cooke FCC/NSD 202 418 2351

Craig Brown FCC/Policy 202/418-1566

Rich Lerner FCC/Competitive Pricing Division 418-~~118~~1530

Doug Gallo FCC/Pricing

Ann Seann FCC/pricing

1/22/98

Michael Pryor	FCC / Policy	418-0495
Jonathan Askin	FCC / Policy	418-2764
Bill Bailey	FCC / Policy	418-7285
Jordan Goroski	FCC / Policy	418-2694
Audrey Wright	FCC / Policy	418-2725
Joe Welch	FCC / Policy	418-1598
Doug Galbi	FCC / Policy	418-2218
Michelle Coney	FCC / Policy	418-1557
KATHERINE SCHRODER	FCC / Policy	418-1560
Iske E. Jennings	FCC / Policy	418-1580
Eric Brantman	Sworder & Berlin	424-7553
DAN GONZALEZ	NEXLINK	466-9755
Janine Kemp Moses	DeltaCom	(205)241-3705
Nanette Edwards	DeltaCom	(205)650-3866
RICH FRUCHTERMAN	WorldCom	202/776-1554
Cheryl Wilcox	INTERMEDIA	813 829-2326
Sandra Stisher	DeltaCom	205-586-7423
Michael E. Thomas	DeltaCom	205-650-3853
Julia Strou	Intermedia	813-829-2072

BellSouth									
SGAT	Florida			Georgia			North Carolina		
	Monthly	Nonrecurring		Monthly	Nonrecurring		Monthly	Nonrecurring	
Unbundled Loops	Recurring	First	Add'l	Recurring	First	Add'l	Recurring	First	Add'l
2w Analog Voice Grade	\$ 17.00	\$ 140.00	\$ 42.00	\$ 25.28	\$ 75.37	\$ 48.63	\$ 16.71	\$ 86.50	\$ 27.80
4w Analog Voice Grade	\$ 30.00	\$ 141.00	\$ 43.00	\$ 36.42	\$ 392.95	\$ 294.62	\$ 38.65	\$ 86.50	\$ 27.80
2w ADSL Compatible	\$ 17.00	\$ 140.00	\$ 42.00	\$ 20.75	\$ 611.82	\$ 517.23	\$ 20.50	\$ 280.15	\$ 243.91
2w HDSL Compatible	\$ 17.00	\$ 140.00	\$ 42.00	\$ 15.39	\$ 611.82	\$ 517.23	\$ 14.75	\$ 280.15	\$ 243.91
4w HDSL Compatible	\$ 30.00	\$ 141.00	\$ 43.00	\$ 19.33	\$ 637.27	\$ 543.29	\$ 20.05	\$ 291.43	\$ 255.46
2w ISDN Digital	\$ 40.00	\$ 308.00	\$ 283.00	\$ 35.98	\$ 432.32	\$ 309.41	\$ 38.00	\$ 276.96	\$ 234.99
4w DS1 Digital	\$ 80.00	\$ 540.00	\$ 465.00	\$ 72.09	\$ 732.05	\$ 435.19	\$ 151.50	\$ 568.96	\$ 335.56
4w 64 kbps digital	---	---	---	\$ 41.71	\$ 614.99	\$ 402.63	---	---	---
Transport									
Common									
Facility Term per MOU	\$ 0.000500	---	---	\$ 0.00037	---	---	\$ 0.00036	---	---
Mile/MOU	\$ 0.000012	---	---	\$ 0.00001	---	---	\$ 0.00004	---	---
Dedicated									
DS0 Facility Term	---	---	---	\$ 17.74	\$ 141.38	\$ 55.81	\$ 38.87	\$ 24.01	---
Mile/MOU	---	---	---	\$ 0.0146	---	---	\$ 3.95	---	---
DS1 Facility Term	\$ 59.75	\$ 100.49	---	\$ 69.23	\$ 221.93	\$ 167.85	\$ 90.00	\$ 100.49	---
Mile/MOU	\$ 1.60	---	---	\$ 0.297	---	---	\$ 23.00	---	---
DS3 Facility Term	---	---	---	---	---	---	\$ 1,200.00	\$ 67.19	---
Mile/MOU	---	---	---	---	---	---	\$ 175.00	---	---
Cross Connects									
2w Analog	\$ 0.30	\$ 9.25	---	\$ 0.28	\$ 42.97	\$ 40.38	\$ 0.30	\$ 19.20	---
4w Analog	\$ 0.50	\$ 9.25	---	\$ 0.57	\$ 43.12	\$ 40.42	\$ 0.50	\$ 19.20	---
DS1	\$ 9.28	\$ 113.75	\$ 14.25	\$ 2.16	\$ 72.38	\$ 52.19	\$ 8.00	\$ 155.00	\$ 27.00
DS3	\$ 72.48	\$ 113.75	\$ 14.25	\$ 38.91	\$ 71.17	\$ 50.53	\$ 72.00	\$ 155.00	\$ 27.00
Loop Concentration									
System (DS1 to VG)	\$ 480.00	\$ 350.00	\$ 90.00	\$ 305.58	\$ 434.43	\$ 106.15	\$ 400.00	\$ 305.00	\$ 74.20
VG Interface per Circuit	\$ 1.50	\$ 5.75	\$ 5.50	\$ 0.98	\$ 35.89	\$ 35.65	\$ 1.15	\$ 5.05	\$ 4.85

EDI Performance

Intermedia Communications Inc

- 80% of orders processed missed the 48 hour firm order committment (8/15/97 thru 1/16/98)

- Delinquent Orders

36% less than 5 days overdue

38% 6-10 days overdue

9% 11-30 days overdue

11% 31-60 days overdue

4% 61-90 days overdue

2% 90+ days overdue